FILED
BRYAN MUNICIPAL COURT
Dec 5, 2025 - 01:30:33 PM

\IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO : CASE NO. CRB2400102
:
v. : JUDGE KENT L. NORTH
:
JEREMY LEE SHEPHERD :

SUPPLEMENTAL EVIDENCE IN SUPPORT OF MOTION TO VACATE JUDGMENT

Defendant submits additional evidence in support of his Motion to Vacate Judgment filed November 19, 2025.

I. NEW EVIDENCE OBTAINED

Since filing the Motion to Vacate, Defendant obtained email correspondence with Lisa L. Nye regarding her authority to sign the criminal complaint in this case.

Key emails Exhibit A.

II. KEY ADMISSIONS IN THE EMAIL

The email correspondence contains the following critical admissions from Lisa L. Nye:

1. EMAIL SIGNATURE BLOCK:

Every email from Ms. Nye bears the following signature:

"Lisa Nye
Deputy Clerk
Williams County Sheriff's Office
1425 E High St., Suite 103
Bryan, OH 43506
419-633-5021"

This signature block identifies Ms. Nye as an employee of the Williams County Sheriff's Office, not Bryan Municipal Court.

2. EMPLOYMENT CONFIRMATION:

In her October 30, 2025 email, Ms. Nye states:

"I have been consistently employed as a Deputy Clerk for the Williams County Sheriff's Office since 2013. There has been no transfer of position or break in service."

This confirms continuous employment with the Sheriff's Office (law enforcement) from 2013 through the present, including February 26, 2024 when she signed the criminal complaint in this case.

3. COUNTY LEGAL APPROVAL:

In her October 30, 2025 email, Ms. Nye states:

"I forwarded this email to our county legal counsel and they advise my prior email providing my Appointment of Deputy Clerk satisfies this request in it's entirety."

This confirms that:
- Williams County legal counsel was consulted about this arrangement
- County officials approved her dual role
- This is official policy/practice, not an isolated error
- County knowledge and approval establishes Monell liability

III. SIGNIFICANCE OF THIS EVIDENCE

This email correspondence conclusively proves the allegations in the Motion to Vacate:

A. CONFLICT OF INTEREST

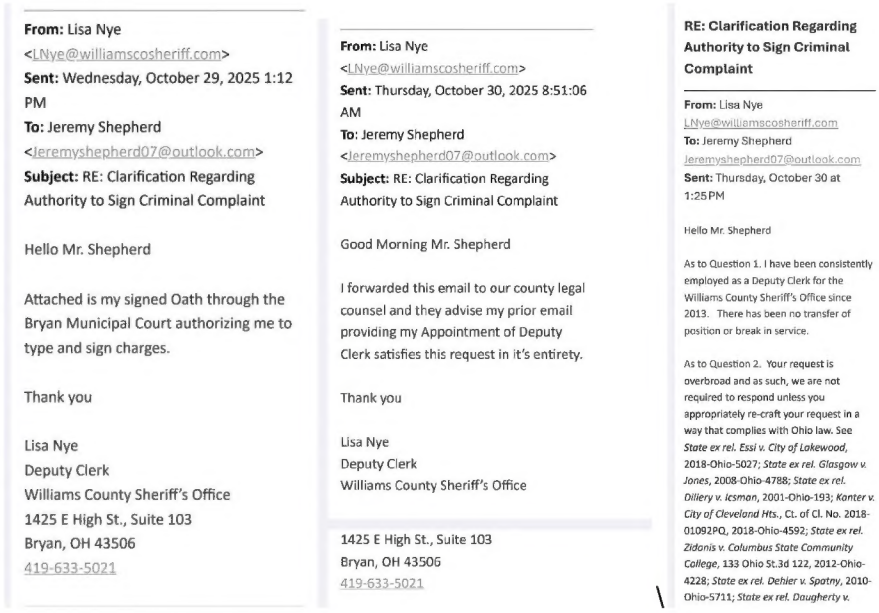
Lisa L. Nye was employed by the Williams County Sheriff's Office (law enforcement/executive branch) at the time she signed a criminal complaint purporting to act as "Deputy Clerk" of Bryan Municipal Court (judicial branch).

This creates an inherent and disqualifying conflict of interest. Law enforcement personnel cannot exercise judicial functions. The separation of powers doctrine prohibits one person from simultaneously serving law enforcement and judicial roles.

B. VOID COMPLAINT

Under Ohio law, a criminal complaint must be signed by someone with proper authority under oath. R.C. 2935.09(D); Crim.R. 3.

Ms. Nye's 2013 oath was as "Deputy Clerk" of Bryan Municipal Court signed by Kent L. North. Her continuous employment with the Sheriff's Office from 2013 onward means she was not serving as a court official when she took that oath or when she signed this complaint.



From: Lisa Nye <LNye@williamscosheriff.com>
Sent: Wednesday, October 29, 2025 1:12 PM
To: Jeremy Shepherd <Jeremyshepherd07@outlook.com>
Subject: RE: Clarification Regarding Authority to Sign Criminal Complaint

Hello Mr. Shepherd

Attached is my signed Oath through the Bryan Municipal Court authorizing me to type and sign charges.

Thank you

Lisa Nye
Deputy Clerk
Williams County Sheriff's Office
1425 E High St., Suite 103
Bryan, OH 43506
419-633-5021

From: Lisa Nye <LNye@williamscosheriff.com>
Sent: Thursday, October 30, 2025 8:51:06 AM
To: Jeremy Shepherd <Jeremyshepherd07@outlook.com>
Subject: RE: Clarification Regarding Authority to Sign Criminal Complaint

Good Morning Mr. Shepherd

I forwarded this email to our county legal counsel and they advise my prior email providing my Appointment of Deputy Clerk satisfies this request in it's entirety.

Thank you

Lisa Nye
Deputy Clerk
Williams County Sheriff's Office

1425 E High St., Suite 103
Bryan, OH 43506
419-633-5021

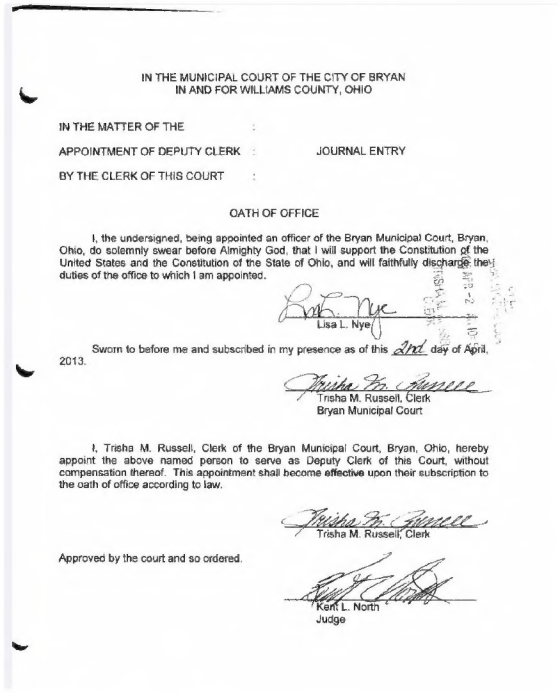
RE: Clarification Regarding Authority to Sign Criminal Complaint

From: Lisa Nye
LNye@williamscosheriff.com
To: Jeremy Shepherd
Jeremyshepherd07@outlook.com
Sent: Thursday, October 30 at 1:25PM

Hello Mr. Shepherd

As to Question 1. I have been consistently employed as a Deputy Clerk for the Williams County Sheriff's Office since 2013. There has been no transfer of position or break in service.

As to Question 2. Your request is overbroad and as such, we are not required to respond unless you appropriately re-craft your request in a way that complies with Ohio law. See *State ex rel. Essi v. City of Lakewood*, 2018-Ohio-5027; *State ex rel. Glasgow v. Jones*, 2008-Ohio-4788; *State ex rel. Dillery v. Icsman*, 2001-Ohio-193; *Kanter v. City of Cleveland Hts.*, Ct. of Cl. No. 2018-01092PQ, 2018-Ohio-4592; *State ex rel. Zidonis v. Columbus State Community College*, 133 Ohio St.3d 122, 2012-Ohio-4228; *State ex rel. Dehler v. Spatny*, 2010-Ohio-5711; *State ex rel. Daugherty v.*



IN THE MUNICIPAL COURT OF THE CITY OF BRYAN
IN AND FOR WILLIAMS COUNTY, OHIO

IN THE MATTER OF THE :
APPOINTMENT OF DEPUTY CLERK : JOURNAL ENTRY
BY THE CLERK OF THIS COURT :

OATH OF OFFICE

I, the undersigned, being appointed an officer of the Bryan Municipal Court, Bryan, Ohio, do solemnly swear before Almighty God, that I will support the Constitution of the United States and the Constitution of the State of Ohio, and will faithfully discharge the duties of the office to which I am appointed.

Lisa L. Nye

Sworn to before me and subscribed in my presence as of this 2nd day of April, 2013.

Trisha M. Russell, Clerk
Bryan Municipal Court

I, Trisha M. Russell, Clerk of the Bryan Municipal Court, Bryan, Ohio, hereby appoint the above named person to serve as Deputy Clerk of this Court, without compensation thereof. This appointment shall become effective upon their subscription to the oath of office according to law.

Trisha M. Russell, Clerk

Approved by the court and so ordered.

Kent L. North
Judge

EXHIBIT A and D

A law enforcement employee claiming court authority creates a void complaint. The complaint is the foundation of the prosecution. If the complaint is void, all subsequent proceedings are void.

C. MUNICIPAL LIABILITY

Ms. Nye's statement that she "forwarded this email to our county legal counsel" and received approval establishes that Williams County officials knew about and approved this arrangement.

This creates municipal liability under Monell v. Department of Social Services, 436 U.S. 658 (1978). When a municipality has a policy or custom that causes constitutional violations, the municipality can be held liable.

Here, Williams County has a policy/custom of allowing Sheriff's Office employees to exercise judicial authority to sign criminal complaints. This policy directly caused the constitutional violations in this case.

D. PATTERN AND PRACTICE

Ms. Nye's email states she has been employed "consistently" since 2013. This suggests she has signed numerous criminal complaints over 12 years while employed by the Sheriff's Office.

Defendant requests the Court order production of all criminal complaints signed by Lisa L. Nye from 2013 to present to determine the scope of this practice.

IV. INDEPENDENT GROUNDS FOR VACATUR

This evidence provides independent grounds to vacate the conviction, separate from all other grounds alleged in the Motion to Vacate:

The complaint is void due to conflict of interest. A void complaint cannot support a conviction. The conviction must be vacated.

V. AUTHENTICATION

The email correspondence is authentic and admissible:
- It was sent from official Williams County Sheriff's Office email address (LNye@williamscosheriff.com)
- It bears official signature block
- It was sent in response to Defendant's official inquiry
- It contains statements against interest (admissions)
- It is self-authenticating as a business record

VII. JUDGE NORTH'S SIGNATURE ON THE 2013 OATH

The 2013 oath appointing Lisa L. Nye as "Deputy Clerk" bears the signature of Judge Kent L. North, who is currently presiding over this case (Exhibit D).

This demonstrates:

1. Judge North personally approved this arrangement in 2013

2. Judge North knew about Ms. Nye's role

3. Judge North has a conflict of interest in now ruling on challenges to the arrangement he approved

4. The systemic nature of the problem - not an isolated error by one person, but institutional approval from the judge presiding over this case

5. Judge North's impartiality is reasonably questioned when ruling on motions challenging his own prior official act

This provides additional grounds for vacating the conviction: the judge presiding over the case has a direct conflict of interest stemming from his approval of the conflicted arrangement that produced the void
complaint.

VI. RELIEF REQUESTED

This supplemental evidence proves the Motion to Vacate must be granted. Defendant requests:

1. The Court accept this supplemental evidence in support of Motion to Vacate;

2. The Court VACATE the conviction due to void complaint;

3. The Court DISMISS all charges with prejudice;

4. The Court ORDER production of all criminal complaints signed by Lisa L. Nye from 2013-present;

5. The Court REFER this matter to appropriate authorities for investigation of systematic misuse of judicial authority by law enforcement personnel.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com
Date: December 5, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via email upon:

James F. Duranczyk, City Prosecutor

c/o pnickolite@cityofbryan.com

Date: December 5, 2025

/s/ Jeremy Lee Shepherd